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March 28, 2023

VIA ECF

Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: In re Search Warrant Dated November 5, 2021, Case No. 21-MC-813 (AT)

Dear Judge Torres:

Following up on and consistent with the December 23, 2022 letter submitted by Paul Calli, Esq. (Docket No. 109), I write seeking entry of an Order discharging me as counsel for James O'Keefe, Project Veritas and the Project Veritas Action Fund in the referenced matter. As detailed in Mr. Calli's letter, James O'Keefe, without interruption, is currently represented by and continues to be represented by counsel, including Jeffrey Lichtman, Esq., Mark Fernich, Esq., Ben Barr, Esq. and Stephen Klein, Esq. Likewise, Project Veritas and the Project Veritas Action Fund, without interruption, is currently represented by and continues to be represented by counsel, including Edward D. Greim, Esq., Ben Barr, Esq. and Stephen Klein, Esq.

In light of the foregoing, I respectfully request that the Court enter an Order discharging me from all further representation of and responsibility for James O'Keefe, Project Veritas and the Project Veritas Action Fund in the referenced matter.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Harlan Protass

cc: All Counsel of Record (via ECF)